

December 15, 2014

Ms. Rebecca Chu
U.S. Environmental Protection Agency, Region 10
1200 Sixth Avenue, AWT-121
Seattle, Washington 98101

BY E-MAIL ONLY

**RE: MONTHLY PROGRESS REPORT – NOVEMBER 2014
JORGENSEN FORGE EARLY ACTION AREA – REMOVAL ACTION
IMPLEMENTATION
U.S. EPA DOCKET NO. CERCLA-10-2013-0032
SEATTLE, WASHINGTON
FARALLON PN: 831-032**

Dear Ms. Chu:

Farallon Consulting, L.L.C. (Farallon) has prepared this monthly progress report on behalf of Earle M. Jorgensen Company (EMJ) to document the activities conducted during November 2014 at the Lower Duwamish Waterway Superfund Site Jorgensen Forge Early Action Area (Site) in Seattle, Washington. This monthly progress report was prepared in accordance with the requirements of the Administrative Settlement Agreement and Order of Consent (AOC) for Removal Action Implementation at the Site issued by U.S. Environmental Protection Agency (EPA) Region 10 on November 5, 2012 under EPA Docket No. CERCLA-10-2013-0032. To date, approximately 75 percent of the required work is complete.

SCOPE OF WORK

This monthly progress report provides:

- A summary of field activities conducted during November 2014;
- Analytical results for samples collected during November 2014;
- A summary of deliverables submitted and received during November 2014;
- A summary of technical and regulatory meetings during November 2014;
- A summary of planned activities, meetings, and deliverables for December 2014 and January 2015; and
- A summary of deviations from the AOC schedule anticipated for December 2014 and January 2015.



FIELD ACTIVITIES – NOVEMBER 2014

The following is a summary of field activities that occurred during November 2014.

- Permanent fencing was installed at the Site on November 7, 2014.
- Pre-Final Certification Inspection meeting with EPA and the U.S. Army Corps of Engineers was held on November 14, 2014.

ANALYTICAL RESULTS – NOVEMBER 2014

No laboratory analytical results were obtained in November. Data validation was completed on the post-construction perimeter surface sediment sampling data obtained in October 2014.

DELIVERABLES – NOVEMBER 2014

- Monthly Progress Report for October 2014 was submitted to EPA on November 13, 2014;
- Revised Operations, Monitoring, and Maintenance Plan Addendum and a Quality Assurance Project Plan for stormwater and groundwater sampling were submitted on to EPA on November 20, 2014; and
- Pre-final Certification Inspection Letter Report was submitted to EPA on November 21, 2014.

TECHNICAL AND REGULATORY MEETINGS – NOVEMBER 2014

In accordance with the Memorandum of Understanding between EMJ, Jorgensen Forge, and The Boeing Company (Boeing), the parties participated in a coordination meeting on November 10, 2014, and a joint coordination meeting with EPA on November 24, 2014.

PLANNED ACTIVITIES, MEETINGS, AND DELIVERABLES – DECEMBER 2014 AND JANUARY 2015

Activities

The pre- and post-construction perimeter monitoring surface sediment sampling results will be submitted to EPA.

Meetings

Project coordination meetings with Boeing are scheduled to occur on December 8, 2014 and semi-monthly during January 2015; and a project coordination meeting with Boeing and EPA is scheduled for January 19, 2015.

Deliverables

The following deliverables have been or will be provided to EPA during December 2014 and January 2015:

- Monthly Progress Report – December 2014 by January 15, 2015.



DEVIATIONS FROM AOC SCHEDULE – DECEMBER 2014 AND JANUARY 2015

EMJ received written notice from EPA on November 25, 2014 that EMJ is in non-compliance with the AOC for the performance of the Non-Time Critical Removal Action of contaminated sediments and associated shoreline bank soils at the Site. On December 9, 2014, EMJ issued a written notice of objection and requested Dispute Resolution under the provisions of the AOC. EMJ requested that the initial “Negotiation Period” under Section XVI of the AOC be extended until February 2, 2015 so the parties can meet to discuss technical issues.

CLOSING

Farallon trusts that this monthly progress report provides sufficient information for EPA. If you have questions regarding this project, please contact the undersigned at (425) 295-0800.

Sincerely,

Farallon Consulting, L.L.C.

Amy Essig Desai
Principal

cc: Mr. E. Gilbert Leon Jr., EMJ (by e-mail only)
Mr. Miles Dyer, Jorgensen Forge Corporation (by e-mail only)
Messrs. William Joyce and Ian Sutton; Joyce Ziker Parkinson, PLLC (by e-mail only)
Messrs. Ryan Barth and David Templeton; Anchor QEA, LLC (by e-mail only)

AED:bw